

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA  
(Philadelphia)**

**In re:** )  
 )  
**Rudy D. Arnold,** )      **Case No. 18-12585-mdc**  
 )  
 )      **Chapter 13**  
**Debtor.** )  
 )  
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**NOTICE OF ENTRY OF APPEARANCE  
AND REQUEST FOR SERVICE  
OF NOTICES AND OTHER PAPERS**

PLEASE TAKE NOTICE that the undersigned counsel hereby enters its appearance on behalf of Manufacturers and Traders Trust Company, successor-in-interest to Wilmington Trust Company, a creditor in the above-referenced case, and requests that it be placed on all general and special and/or limited mailing matrices in this case, and that pursuant to 11 U.S.C. Sections 102(1), 342 and 1109(b) and Bankruptcy Rules 2002, 4001, 9007 and 9010, all notices given or required to be given in this case, and all papers served or required to be served in this case, be given to and served upon the undersigned counsel for Manufacturers and Traders Trust Company at the address set forth below.

Shaan S. Chima, Esquire  
GEBHARDT & SMITH LLP  
One South Street, Suite 2200  
Baltimore, Maryland 21202  
Tel: 410.385.5109  
Fax: 443.957.4329  
Email: shaan.chima@gebsmith.com

PLEASE TAKE FURTHER NOTICE that the foregoing request includes not only notices and papers referred to in the Bankruptcy Rules, but also includes, without limitation, all orders and

notices of any application, motion, order, petition, request, complaint, or hearing dates, whether formal or informal, written or oral, and whether transmitted by mail, hand delivery, telecopy, electronically, or otherwise, which affects the debtor or property of the debtor.

PLEASE TAKE FURTHER NOTICE that neither this notice nor any subsequent appearance, pleading, claim, or suit is intended nor shall be deemed to waive Manufacturers and Traders Trust Company's: (i) right to have final orders in non-core matters entered only after *de novo* review by a United States District Court Judge, (ii) right to trial by jury in any proceedings so triable herein or in any case, controversy or proceeding related to these cases, (iii) right to have the reference withdrawn by the United States District Court in any matter subject to mandatory or discretionary withdrawal, (iv) any other rights, claims, actions, defenses, setoffs or recoupments to which it is or may be entitled, at law or in equity, all of which are expressly reserved, (v) any election of remedy, or (vi) any objection to the jurisdiction of this Court for any purpose other than with respect to this Notice.

Respectfully submitted,

/s/ Shaan S. Chima

Shaan S. Chima, Esquire (Pa. Bar No. 312429)  
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*Counsel for Manufacturers and Traders Trust Company, successor-in-interest to Wilmington Trust Company*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 12th day of June, 2018, a copy of the foregoing Notice of Entry of Appearance and Request for Services of Notices and Other Papers was mailed, via first-class mail, postage prepaid, to:

Rudy D. Arnold  
1833 New London Road  
Landenberg, Pennsylvania 19350  
*Debtor*

Rudy D. Arnold  
P.O. Box 26  
Kemblesville, Pennsylvania 19347  
*Debtor*

Christopher Constantine Carr, Esq.  
Law Offices of Christopher Constantine Carr  
122 Mayfield Drive  
Coatesville, Pennsylvania 19320  
*Counsel for Debtor*

William C. Miller, Esq.  
1234 Market Street, Suite 1813  
Philadelphia, Pennsylvania 19107  
*Chapter 13 Trustee*

William C. Miller, Esq.  
P.O. Box 1229  
Philadelphia, Pennsylvania 19105  
*Chapter 13 Trustee*

Office of the United States Trustee  
833 Chestnut Street, Suite 500  
Philadelphia, Pennsylvania 19107  
*U.S. Trustee*

/s/ Shaan S. Chima  
Shaan S. Chima